

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -x 07-CIV-8297 (SHS)
U2 HOME ENTERTAINMENT, INC., :
 :
 Plaintiff, :
 :
 vs. :
 :
 XIU HUI CHEN AND "JOHN DOES" II THROUGH :
 V DOING BUSINESS AS "BROADWAY AUDIO" :
 :
 Defendants. :
- - - - -x

NOTICE OF MOTION FOR DEFAULT JUDGMENT
AGAINST XIU HUI CHEN DOING BUSINESS AS "BROADWAY AUDIO"

To: Xiu Hui Chen
125 Allen Street
Apt. 6D
New York, New York 10002

PLEASE TAKE NOTICE that plaintiff, U2 HOME ENTERTAINMENT INC. hereby moves for a default judgment against Xiu Hui Chen doing business as "Broadway Audio" in the form attached hereto as Exhibit A; the Clerk's Certificate of Default is attached hereto as Exhibit B; the affirmation of Harvey Shapiro, attached hereto as Exhibit C; the affirmation of Walter-Michael Lee, attached hereto as Exhibit D; the affidavit of Alan T. Huie, attached hereto as Exhibit E; and all prior pleadings and proceedings herein. A memorandum of law is also submitted in support of plaintiff's motion.


Pursuant to Local Rule 6.1, any opposition to this motion shall be served within ten (10) business days after service of

this motion. Reply papers, if any, shall be served five (5) business days after service of the opposing papers.

The return date for this motion is February 29, 2008, at 10:00 AM, Courtroom 23A before the Honorable Sydney H. Stein.

Dated: February 6, 2008

SARGOY, STEIN, ROSEN & SHAPIRO

By: 
Harvey Shapiro
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ATTORNEYS FOR PLAINTIFF